

**SMITH & LOWNEY, P.L.L.C.**

2317 EAST JOHN STREET  
SEATTLE, WASHINGTON 98112  
(206) 860-2883, FAX (206) 860-4187

March 11, 2015

**RECEIVED ON:**

**Via Certified Mail - Return Receipt Requested**

Managing Agent  
Overlake Oil, Inc.  
1005 8th Street  
Kirkland, WA 98033

**MAR 12 2015**

*ORC*

EPA Region 10  
Office of the Regional Administrator

**Via Certified Mail - Return Receipt Requested**

Managing Agent  
Overlake Oil, Inc.  
PO Box 506  
Kirkland, WA 98083-0506

**Via Certified Mail - Return Receipt Requested**

Jim Jessen, Registered Agent  
1021 8th St.  
Kirkland, WA 98033

Re: **NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND  
REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION  
PLAN**

Dear Managing Agent:

This letter is submitted on behalf of Waste Action Project, P.O. Box 4832, Seattle, WA 98194, (206) 849-5927. Any response or correspondence related to this matter should be directed to Smith & Lowney, PLLC at the letterhead address. This letter is to provide you with sixty days notice of Waste Action Project's intent to file a citizen suit against Overlake Oil, Inc. ("Overlake Oil") under section 505 of the Clean Water Act ("CWA"), 33 USC § 1365, for the violations described below. This letter is also a request for a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by Overlake Oil's National Pollution Discharge Elimination System ("NPDES") permit.

Overlake Oil was granted coverage under the Washington Industrial Stormwater General Permit issued by the Washington Department of Ecology ("Ecology") on October 21, 2009, effective January 1, 2010, modified May 16, 2012, effective July 1, 2012, through January 1, 2015, under NPDES Permit No. WAR002259 (the "2010 Permit"). Overlake Oil was granted coverage under the current iteration of the Washington Industrial Stormwater General Permit issued by Ecology on December 3, 2014, effective January 2, 2015 and set to expire on December 31, 2019 (the "2015 Permit") and maintains the same permit number WAR002259.

Overlake Oil has violated and continues to violate the terms and conditions of the 2010 Permit and the 2015 Permit (collectively, the "Permits") with respect to operations of, and discharges of stormwater and pollutants from, its facility located at or near 1005 8<sup>th</sup> Street, Kirkland, WA 98033 (the "facility"). The facility subject to this notice includes any contiguous or adjacent properties owned or operated by Overlake Oil.

**I. WASTE ACTION PROJECT'S COMMITMENT TO PROTECTING AND PRESERVING THE ENVIRONMENT OF WASHINGTON STATE, ESPECIALLY THE QUALITY OF ITS WATERS.**

Waste Action Project is a non-profit, public interest, environmental advocacy organization. Waste Action Project intends to sue on behalf of itself and its member(s). Waste Action Project has members who live, work, fish, and recreate around Lake Washington and are affected by the violations described herein.

This notice of intent to sue Overlake Oil is part of Waste Action Project's effort to improve water quality in Washington for purposes including swimming, habitat quality, and subsistence, recreational, and commercial fishing. Waste Action Project has serious concerns about the impacts of Overlake Oil's operations and industrial stormwater discharges reaching Lake Washington. As discussed below, Overlake Oil has consistently violated permit conditions and exceeded the 2010 Permit's benchmark pollutant discharge levels. Overlake Oil's operations and stormwater discharges degrade the lake's water quality and place the health and well-being of all who use the lake at risk.

**II. COMPLIANCE WITH STANDARDS.**

**A. Violations of Water Quality Standards.**

Condition S10.A of the Permits prohibits discharges that cause or contribute to violations of water quality standards. Water quality standards are the foundation of the CWA and Washington's efforts to protect clean water. In particular, water quality standards represent the U.S. Environmental Protection Agency ("EPA") and Ecology's determination, based on scientific studies, of the thresholds at which pollution starts to cause significant adverse effects on fish or other beneficial uses. For each water body in Washington, Ecology designates the "beneficial uses" that must be protected through the adoption of water quality standards.

A discharger must comply with both narrative and numeric water quality standards. WAC 173-201A-010; WAC 173-201A-510 ("No waste discharge permit can be issued that causes or contributes to a violation of water quality criteria, except as provided for in this chapter."). Narrative water quality standards provide legal mandates that supplement the numeric standards. Furthermore, narrative water quality standards apply with equal force, even when Ecology has established numeric water quality standards. Specifically, Condition S10.A of the Permits requires that Overlake Oil's discharges not cause or contribute to violations of Washington State's water quality standards.



Overlake Oil discharges to Lake Washington via combined stormwater drains and/or other conveyances. Lake Washington does not meet the water quality standards for fecal coliform and is included in the state's "303(d) list" of impaired water bodies. Overlake Oil discharges stormwater that contains elevated levels of fecal coliform, turbidity, zinc and copper as indicated in the table of benchmark exceedances below. Further, the data provided in the table below represent samples collected from only one of Overlake Oil's discharge points. Discharges of stormwater from the facility cause and/or contribute to violations of water quality standards for turbidity, zinc, copper, and fecal coliform in Lake Washington and have occurred each and every day during the last five years on which there was 0.1 inch or more of precipitation, and continue to occur. These water quality standards include those set forth in WAC 173-201A-240, and -260(2). Precipitation data from that time period are appended to this notice of intent to sue and identifies these days.

TABLE 1: DISCHARGE MONITORING REPORT DATA FOR OVERLAKE OIL, INC.					
Quarter in which sample collected	Turbidity (NTU) (Benchmark 25 NTU)	Zinc (µg/L) (Benchmark 117 µg/L)	Copper (µg/L) (Benchmark 14 µg/L)	Oil Sheen Present (Yes/No) (Benchmark "No Visible Sheen")	Fecal Limit
1Q 2010	<b>44</b>	<b>57</b>	<b>15</b>	no	2
2Q 2010	23.2	<b>257</b>	11.9	no	<b>90</b>
3Q 2010	17.8	<b>132</b>	13.5	no	23
4Q 2010	19.3	<b>232</b>	14	no	11
1Q 2011	<b>68</b>	<b>373</b>	<b>31.2</b>	no	<2
2Q 2011					
3Q 2011	21	<b>239</b>	<b>19.3</b>	no	<b>300</b>
4Q 2011	<b>34.4</b>	84.6	4.8	no	<b>900</b>
1Q 2012	<b>38</b>	<b>907</b>	9.5	no	35
2Q 2012	<b>52</b>	<b>486</b>	3.65	no	0
3Q 2012					
4Q 2012	<b>38</b>	<b>1160</b>	<b>28.1</b>	no	<b>1100</b>
1Q 2013					
2Q 2013	12	<b>643</b>	5.6	no	No data
3Q 2013					
4Q 2013	17	<b>938</b>	13.2	no	No data
1Q 2014	19	<b>545</b>	3.19	no	No data
2Q 2014					
3Q 2014					
4Q 2014	12	<b>1410</b>	<b>15.5</b>	No	No data

Note: Table 1 lists benchmark levels established in the 2010 Permit. Values in **bold** indicate benchmark exceedances.

## **B. Compliance with Standards.**

Condition S10.C of the Permits requires Overlake Oil to apply all known and reasonable methods of prevention, control and treatment ("AKART") to all discharges, including preparing and implementing an adequate SWPPP and best management practices ("BMPs"). Overlake Oil has violated and continues to violate these conditions by failing to apply AKART to its discharges by, among other things, failing to implement an adequate SWPPP and BMPs as evidenced by the elevated levels of pollutants in its discharge indicated in the table above and as described below.

Condition S1.A of the Permits require that all discharges and activities be consistent with the terms and conditions of the permit. Overlake Oil has violated this condition by discharging and acting inconsistent with the conditions of the Permits as described in this Notice of Intent to Sue.

## **III. STORMWATER POLLUTION PREVENTION PLAN VIOLATIONS.**

Waste Action Project did not receive a SWPPP in response to its request to Ecology for public records relating to Overlake Oil. However, the extensive violations of the Permits documented in the publically available records, including the numerous violations of the SWPPP requirements described in an inspection report, indicate that Overlake Oil is not fully implementing a SWPPP that includes adequate BMPs and that otherwise includes all of the required SWPPP components. Waste Action Project therefore provides notice, based upon information and belief, that Overlake Oil has not developed and implemented a SWPPP that complies with the requirements of the Permits as described below.

Condition S3.A.1 of the Permits requires Overlake Oil to develop and implement a SWPPP as specified in these permits. Condition S3.A.2 of the Permits requires the SWPPP to specify BMPs necessary to provide AKART and ensure that discharges do not cause or contribute to violations of water quality standards. On information and belief, Overlake Oil has violated these requirements of the Permits each and every day during the last five years, and continues to violate them as it has failed to prepare and/or implement a SWPPP that includes AKART BMPs and BMPs necessary to meet state water quality standards.

Condition S3.A of the Permits requires Overlake Oil to have and fully implement a SWPPP that is consistent with permit requirements and update the SWPPP as necessary to maintain compliance with permit conditions. On information and belief, Overlake Oil has violated these requirements of the Permits each and every day during the last five years and continues to violate them because it does not have a SWPPP that is consistent with permit requirements, fully implemented, and updated as necessary.

The SWPPP fails to satisfy the requirements of Condition S3 of the Permits because it does not adequately describe BMPs. Condition S3.B.4 of the Permits requires that the SWPPP include a description of the BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S3.A.3 of the Permits requires that the SWPPP include BMPs consistent with approved stormwater technical manuals or



document how stormwater BMPs included in the SWPPP are demonstratively equivalent to the practices contained in the approved stormwater technical manuals, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs. Overlake Oil's SWPPP does not comply with these requirements because it does not adequately describe BMPs, does not include BMPs consistent with approved stormwater technical manuals, and does not include BMPs that are demonstratively equivalent to such BMPs with documentation of BMP adequacy.

Overlake Oil's SWPPP fails to satisfy the requirements of Condition S3.B.2 of the Permits because it fails to include a facility assessment. The SWPPP fails to include an adequate facility assessment because it does not describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, the regular business hours, and the seasonal variations in business hours or in industrial activities.

Overlake Oil's SWPPP fails to satisfy the requirements of Condition S3.B.1 of the Permits because it does not include a site map that identifies significant features, the stormwater drainage and discharge structures, the stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a unique identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential soil erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.

Overlake Oil's SWPPP fails to comply with Condition S3.B.2.b of the Permits because it does not include an inventory of industrial activities that identifies all areas associated with industrial activities that have been or may potentially be sources of pollutants. The SWPPP does not identify all areas associated with loading and unloading of dry bulk materials or liquids, outdoor storage of materials or products, outdoor manufacturing and processing, on-site dust or particulate generating processes, on-site waste treatment, storage, or disposal, vehicle and equipment fueling, maintenance and/or cleaning, roofs or other surfaces exposed to air emissions from a manufacturing building or a process area, and roofs or other surfaces composed of materials that may be mobilized by stormwater as required by these permit conditions.

Overlake Oil's SWPPP does not comply with Condition S3.B.2.c of the Permits because it does not include an adequate inventory of materials. The SWPPP does not include an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution, a short narrative for each of the materials describing the potential for the pollutants to be present in stormwater discharge that is updated when data becomes available to verify the presence or absence of the pollutants, a narrative description of any potential sources of pollutants from past activities, materials and spills that were previously handled, treated, stored, or disposed of in a manner to allow ongoing exposure to stormwater as required. The SWPPP does not include the method and location of on-site storage or disposal of such

materials and a list of significant spills and significant leaks of toxic or hazardous pollutants as these permit conditions require.

Overlake Oil's SWPPP does not comply with Condition S3.B.3 of the Permits because it does not identify specific individuals by name or title whose responsibilities include SWPPP development, implementation, maintenance, and modification.

Condition S3.B.4 of the Permits requires that permittees include in their SWPPPs and implement certain mandatory BMPs unless site conditions render the BMPs unnecessary, infeasible, or an alternative and equally effective BMPs are provided. Overlake Oil is in violation of this requirement because it has failed to include in its SWPPP and implement the mandatory BMPs of the Permits.

Overlake Oil's SWPPP does not comply with Condition S3.B.4.b.i of the Permits because it does not include adequate required operational source control BMPs in the following categories: good housekeeping (including definition of ongoing maintenance and cleanup of areas that may contribute pollutants to stormwater discharges, and a schedule/frequency for each housekeeping task); preventive maintenance (including BMPs to inspect and maintain stormwater drainage, source controls, treatment systems, and plant equipment and systems, and the schedule/frequency for each task); spill prevention and emergency cleanup plan (including BMPs to prevent spills that can contaminate stormwater, for material handling procedures, storage requirements, cleanup equipment and procedures, and spill logs); employee training (including an overview of what is in the SWPPP, how employees make a difference in complying with the SWPPP, spill response procedures, good housekeeping, maintenance requirements, material management practices, how training will be conducted, the frequency/schedule of training, and a log of the dates on which specific employees received training); inspections and recordkeeping (including documentation of procedures to ensure compliance with permit requirements for inspections and recordkeeping, including identification of personnel who conduct inspections, provision of a tracking or follow-up procedure to ensure that a report is prepared and appropriate action taken in response to visual monitoring, definition of how Overlake Oil will comply with signature and record retention requirements, and certification of compliance with the SWPPP and Permit).

Overlake Oil's SWPPP does not comply with Condition S3.B.4.b.i.7 of the Permits because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges to stormwater sewers, or to surface waters and ground waters of the state.

Overlake Oil's SWPPP does not comply with Condition S3.B.4.b.ii of the Permits because it does not include required structural source control BMPs to minimize the exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff. Overlake Oil's SWPPP does not comply with Condition S3.B.4.b.iii of the Permits because it does not include treatment BMPs as required.



Overlake Oil's SWPPP fails to comply with Condition S3.B.4.b.v of the Permits because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.

Overlake Oil's SWPPP fails to satisfy the requirements of Condition S3.B.5 of the Permits because it fails to include an adequate stormwater sampling plan as required. The SWPPP does not include a sampling plan that identifies points of discharge to surface waters, storm sewers, or discrete ground water infiltration locations, documents why each discharge point is not sampled, identifies each sampling point by its unique identifying number, identifies staff responsible for conducting stormwater sampling, specifies procedures for sampling collection and handling, specifies procedures for sending samples to the a laboratory, identifies parameters for analysis, holding times and preservatives, laboratory quantization levels, and analytical methods, and that specifies the procedure for submitting the results to Ecology.

#### **IV. MONITORING AND REPORTING VIOLATIONS.**

##### **A. Failure to Collect Quarterly Samples.**

Condition S4.B of the Permits requires Overlake Oil to collect a sample of its stormwater discharge once during every calendar quarter. Conditions S3.B.5.b and S4.B.2.c of the Permits require Overlake Oil to collect stormwater samples at each distinct point of discharge offsite except for substantially identical outfalls, in which case only one of the substantially identical outfalls must be sampled. These conditions set forth sample collection criteria, but require the collection of a sample even if the criteria cannot be met.

Overlake Oil violated these requirements by failing to collect stormwater samples at any of its discharge points during the second quarter of 2011, the third quarter of 2012, the first and third quarters of 2013, and the second and third quarters of 2014.

Overlake Oil has also violated and continues to violate these conditions because it does not sample each distinct point of discharge off-site each quarter. These violations have occurred and continue to occur each and every quarter during the last five years that Overlake Oil was and is required to sample its stormwater discharges, including the quarters in which it collected stormwater discharge samples from some, but not all, points of discharge. These violations will continue until Overlake Oil commences monitoring all distinct points of discharge.

##### **B. Failure to Analyze Quarterly Samples.**

Conditions S5.A.1 and S6.C of the Permits require Overlake Oil to analyze stormwater samples collected quarterly for turbidity, pH, total zinc, total copper, oil sheen, and fecal coliform.

Overlake Oil violated this condition by failing to analyze stormwater samples for any of the required parameters during the second quarter of 2011, the third quarter of 2012, the

first and third quarters of 2013, and the second and third quarters of 2014. Overlake Oil also violated these requirements by failing to analyze stormwater samples for fecal coliform during the second quarter of 2013.

**C. Failure to Timely Submit Discharge Monitoring Reports.**

Condition S9.A of the Permits require Overlake Oil to use DMR forms provided or approved by Ecology to summarize, report and submit monitoring data to Ecology. For each monitoring period (calendar quarter) a DMR must be completed and submitted to Ecology not later than 45 days after the end of the monitoring period. Overlake Oil has violated these conditions by failing to submit a DMR within the time prescribed for the third quarter of 2013 and the first, second and third quarters of 2014.

**D. Failure to Comply with Visual Monitoring Requirements.**

Condition S7.A of the Permits requires that monthly visual inspections be conducted at the facility by qualified personnel. Each inspection is to include observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged, observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharges, observations for the presence of illicit discharges, a verification that the descriptions of potential pollutant sources required by the permit are accurate, a verification that the site map in the SWPPP reflects current conditions, and an assessment of all BMPs that have been implemented (noting the effectiveness of the BMPs inspected, the locations of BMPs that need maintenance, the reason maintenance is needed and a schedule for maintenance, and locations where additional or different BMPs are needed).

Condition S7.C of the Permits requires that Overlake Oil record the results of each inspection in an inspection report or checklist that documents the observations, verifications, and assessments required. The report/checklist must include the time and date of the inspection, the locations inspected, a statement that, in the judgment of the person conducting the inspection and the responsible corporate officer, the facility is either in compliance or out of compliance with the SWPPP and the Permits, a summary report and schedule of implementation of the remedial actions that Overlake Oil plans to take if the site inspection indicates that the facility is out of compliance, the name, title, signature and certification of the person conducting the facility inspection, and a certification and signature of the responsible corporate officer or a duly authorized representative.

Overlake Oil is in violation of these requirements of Condition S7 of the Permits because, during the last five years, it has failed to conduct each of the requisite visual monitoring and inspections, failed to prepare and maintain the requisite inspection reports or checklists, and failed to make the requisite certifications and summaries.



## **V. CORRECTIVE ACTION VIOLATIONS.**

### **A. Violations of the Level One Requirements of the Permits.**

Condition S8.B of the Permits requires Overlake Oil take specified actions, called a “Level One Corrective Action,” each time quarterly stormwater sample results exceed a benchmark value or are outside the benchmark range for pH. Condition S8.A of the 2015 Permit requires that Overlake Oil implement any Level One Corrective Action required by the 2010 Permit.

As described by Condition S8.B of the Permits, a Level One Corrective Action requires Overlake Oil: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits and contains the correct BMPs from the applicable Stormwater Management Manual; (2) make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges and sign and certify the revised SWPPP in accordance with Condition S3 of the Permits; and (3) summarize the Level One Corrective Action in the Annual Report required under Condition S9.B of the Permits. Condition S8.B.3 of the Permits requires that Overlake Oil implement the revised SWPPP as soon as possible, and no later than the DMR due date for the quarter the benchmark was exceeded.

Condition S5.A and Table 2 of the Permits establish the following applicable benchmarks: turbidity 25 NTU; pH 5 – 9 SU; no visible oil sheen; total copper 14 µg/L; and total zinc 117 µg/L.

Overlake Oil has violated the requirements of the Permits described above by failing to conduct a Level One Corrective Action in accordance with permit conditions, including the required review, revision, and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report each time during the last five years that quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH, including the benchmark excursions identified in Table 1 in Section II.A of this letter.

These benchmark excursions are based upon information currently available to Waste Action Project from Ecology’s publicly available records. Waste Action Project provides notice of its intent to sue Overlake Oil for failing to comply with all of the Level One Corrective Action requirements described above by failing to conduct a Level One Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report each time during the last five years its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH, including the benchmark excursions listed in Table 1 above.

**B. Violations of the Level Two Requirements of the Permits.**

Condition S8.C of the Permits requires Overlake Oil take specified actions, called a "Level Two Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for pH for any two quarters during a calendar year. Condition S8.A of the 2015 Permit requires that Overlake Oil implement any Level Two Corrective Action required by the 2010 Permit.

As described by Condition S8.C of the Permits, a Level Two Corrective Action requires Overlake Oil: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the 2010 Permit; (2) make appropriate revisions to the SWPPP to include additional structural source control BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and sign and certify the revised SWPPP in accordance with Condition S3 of the Permits; and (3) summarize the Level Two Corrective Action (planned or taken) in the Annual Report required under Condition S9.B of the Permits. Condition S8.C.4 of the Permits requires that Overlake Oil implement the revised SWPPP according to Condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than August 31st of the following year.

The Permits establishes the benchmarks applicable to Overlake Oil described in Section V.A of this notice of intent to sue letter.

Overlake Oil has violated the requirements of the Permits described above by failing to conduct a Level Two Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs to ensure that all points of discharge from the facility meet benchmarks (not just the sampled point of discharge), including additional structural source control BMPs, and the required summarization in the annual report each time during the last five years its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH for any two quarters during a calendar year. As indicated in Table 1 in Section II.A of this letter, these violations include, but are not limited to, Overlake Oil's failure to fulfill these obligations for turbidity, zinc, and copper triggered by its stormwater sampling during the calendar year of 2011, and for zinc triggered by its stormwater sampling during the calendar years of 2013 and 2014.

The benchmark excursions identified in Table 1 of this notice of intent to sue letter are based upon information currently available to Waste Action Project from Ecology's publicly available records. Waste Action Project provides notice of its intent to sue Overlake Oil for failing to comply with all of the Level Two Corrective Action requirements each and every time quarterly stormwater sample results exceeded an applicable benchmark value or were outside the benchmark range for pH for any two quarters during a calendar year, including any such excursions that are not reflected in Table 1 above, during the last five years.



### **C. Violations of the Level Three Requirements of the Permits.**

Condition S8.D of the Permits requires Overlake Oil take specified actions, called a “Level Three Corrective Action,” each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for pH for any three quarters during a calendar year. Condition S8.A of the 2015 Permit requires that Overlake Oil implement any Level Three Corrective Action required by the 2010 Permit.

As described by Condition S8.D of the 2010 Permit, a Level Three Corrective Action requires that Overlake Oil: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the 2010 Permit; (2) make appropriate revisions to the SWPPP to include additional treatment BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and additional operational and/or structural source control BMPs if necessary for proper function and maintenance of treatment BMPs, and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the 2010 Permit; and (3) summarize the Level Three Corrective Action (planned or taken) in the Annual Report required under Condition S9.B of the 2010 Permit, including information on how monitoring, assessment, or evaluation information was (or will be) used to determine whether existing treatment BMPs will be modified/enhanced, or if new/additional treatment BMPs will be installed. Condition S8.D.2.b of the 2010 Permit requires that a licensed professional engineer, geologist, hydrogeologist, or certified professional in storm water quality must design and stamp the portion of the SWPPP that addresses stormwater treatment structures or processes.

Condition S8.D.3 of the 2010 Permit requires that, before installing BMPs that require the site-specific design or sizing of structures, equipment, or processes to collect, convey, treat, reclaim, or dispose of industrial stormwater, Overlake Oil submit an engineering report, plans, and specifications, and an operations and maintenance manual to Ecology for review in accordance with chapter 173-204 of the Washington Administrative Code. The engineering report must be submitted no later than the May 15 prior to the Level Three Corrective Action Deadline. The plans and specifications and the operations and maintenance manual must be submitted to Ecology at least 30 days before construction/installation.

Condition S8.D.5 of the 2010 Permit requires that Overlake Oil fully implement the revised SWPPP according to condition S3 of the 2010 Permit and the applicable stormwater management manual as soon as possible, and no later than September 30th of the following year.

The Permits establish the benchmarks applicable to Overlake Oil described in Section V.A of this notice of intent to sue letter.

Overlake Oil has violated the requirements of the Permits described above by failing to conduct a Level Three Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, including the requirement to have a specified professional design and stamp the portion of the SWPPP pertaining to treatment, the required implementation of additional BMPs, including additional treatment BMPs to ensure that all points of discharge from the facility meet benchmarks (not just the

sampled point of discharge), the required submission of an engineering report, plans, specifications, and an operations and maintenance plan, and the required summarization in the annual report each time during the last five years its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH for any three quarters during a calendar year. As indicated in Table 1 in Section II.A of this letter, these violations include, but are not limited to, Overlake Oil's failure to fulfill these obligations for zinc triggered by its stormwater sampling during the calendar year of 2010 and for turbidity and zinc triggered by its stormwater sampling during the calendar year of 2012.

The benchmark excursions identified in Table 1 of this notice of intent to sue letter are based upon information currently available to Waste Action Project from Ecology's publicly available records. Waste Action Project provides notice of its intent to sue Overlake Oil for failing to comply with all of the Level Three Corrective Action requirements each and every time quarterly stormwater sample results exceeded an applicable benchmark value or were outside the benchmark range for pH for any three quarters during a calendar year, including any such excursions that are not reflected in Table 1 above, during the last five years.

## **VI. VIOLATIONS OF THE ANNUAL REPORT REQUIREMENTS.**

Condition S9.B of the Permits requires Overlake Oil to submit an accurate and complete annual report to Ecology no later than May 15 of each year. The annual report must include corrective action documentation as required in Conditions S8.B through S8.D. If a corrective action is not yet completed at the time of submission of the annual report, Overlake Oil must describe the status of any outstanding corrective action. Specific information to be included in the annual report is identification of the conditions triggering the need for corrective action, description of the problem and identification of dates discovered, summary of any Level 1, 2, or 3 corrective actions completed during the previous calendar year, including the dates corrective actions completed, and description of the status of any Level 2 or 3 corrective actions triggered during the previous calendar year, including identification of the date Overlake Oil expects to complete corrective actions. Overlake Oil has violated this condition by failing to include all of the required information in the annual reports it submitted for years 2010, 2011, 2012, and 2013.

The annual report submitted by Overlake Oil for 2010 (submitted on May 16, 2011) does not include all of the required information. The report does not provide any of the required information for each of the Level One Corrective Actions triggered in 2010, including those for turbidity and copper. The annual report provides inadequate and incomplete information for the Level Three Corrective Action triggered for zinc in 2010, including the description of the conditions triggering the corrective action, the BMPs (including treatment) to be implemented as part of the Level Three Corrective Action, and the implementation schedule. The annual report does not include information on how monitoring, assessment, or evaluation information was (or will be) used to determine whether existing treatment BMPs will be modified/enhanced, or if new/additional treatment BMPs will be installed as required by Condition S8.D.4.



The annual report submitted by Overlake Oil for 2011 (submitted on May 9, 2012) does not include all of the required information. For example, the report does not describe the completion or status of the Level Three Corrective Action triggered for zinc in 2010 and required to be completed in 2011, or the information required by Condition S8.D.4 of the 2010 Permit for that Level Three Corrective Action. The annual report does not sufficiently describe the conditions triggering Level Two Corrective Actions for turbidity, zinc, and copper in 2011. The annual report incorrectly notes a Level Two corrective action for Zinc, when it continues to maintain Level Three status.

Overlake Oil's annual report submitted for 2012 does not include all of the required information. The annual report does not sufficiently describe the status of the Level Two Corrective Action triggered for turbidity in 2011 and fails to acknowledge or describe the status of the Level Two Correction Action triggered for copper in 2011. The annual report does not include information identifying the conditions triggering a Level Three Corrective Action for turbidity in 2012, describing the problems, or identifying the dates the problems were discovered. The report provides an inadequate and incomplete description of measures taken as part of the Level Three Corrective Action for zinc triggered in 2010 and 2012. The annual report does not include information on how monitoring, assessment, or evaluation information was (or will be) used to determine whether existing treatment BMPs will be modified/enhanced, or if new/additional treatment BMPs will be installed as required by Condition S8.D.4 of the 2010 Permit.

Overlake Oil's annual report submitted for 2013 does not include all of the required information. The report does not describe the completion or status of the ongoing Level Three Corrective Action triggered for zinc that was to be completed in 2012 but states corrective actions are expected to be completed in Fall 2014. The report also fails to acknowledge or describe the status of the Level Three Corrective Action triggered for turbidity in 2012 or the information required by Condition S8.D.4 of the 2010 Permit for that Level Three Corrective Action.

## **VII. VIOLATIONS OF THE RECORDKEEPING REQUIREMENTS.**

### **A. Failure to Record Information.**

Condition S4.B.3 of the Permits requires Overlake Oil to record and retain specified information for each stormwater sample taken, including the sample date and time, a notation describing if Overlake Oil collected the sample within the first 30 minutes of stormwater discharge event, an explanation of why Overlake Oil could not collect a sample within the first 30 minutes of a stormwater discharge event, the sample location, method of sampling and of preservation, and the individual performing the sampling. Upon information and belief, Overlake Oil is in violation of these conditions, as it has not recorded each of these specified items for each sample taken during the last five years.

**B. Failure to Retain Records.**

Condition S9.C of the Permits requires Overlake Oil to retain for a minimum of five years a copy of the Permits, a copy of Overlake Oil's coverage letter, records of all sampling information, inspection reports including required documentation, any other documentation of compliance with permit requirements, all equipment calibration records, all BMP maintenance records, all original recordings for continuous sampling instrumentation, copies of all laboratory results, copies of all required reports, and records of all data used to complete the application for the Permits. Upon information and belief, Overlake Oil is in violation of these conditions because it has failed to retain records of such information, reports, and other documentation during the last five years.

**VIII. REQUEST FOR SWPPP.**

Pursuant to Condition S9.F of the 2015 Permit, Waste Action Project hereby requests that Overlake Oil provide a copy of, or access to, its SWPPP complete with all incorporated plans, monitoring reports, checklists, and training and inspection logs. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the letterhead address.

Should Overlake Oil fail to provide the requested complete copy of, or access to, its SWPPP as required by Condition S9.F of the 2015 Permit, it will be in violation of that condition, which violation shall also be subject to this notice of intent to sue and any ensuing lawsuit.

**IX. Party Giving Notice of Intent to Sue.**

The full name, address, and telephone number of the party giving notice is:

Waste Action Project  
P.O. Box 4832  
Seattle, WA 98194  
(206) 849-5927

**X. Attorneys Representing Waste Action Project.**

The attorneys representing Waste Action Project in this matter are:

Richard Smith  
Smith & Lowney, PLLC  
2317 E. John St.  
Seattle, WA 98112  
(206) 860-2124

Meredith Crafton  
Smith & Lowney, PLLC  
2317 E. John St.  
Seattle, WA 98112  
(206) 860-2883



## **XI. CONCLUSION.**

The above-described violations reflect those indicated by the information currently available to Waste Action Project. These violations are ongoing. Waste Action Project intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.


Under Section 309(d) of the CWA, 33 USC § 1319(d), each of the above-described violations subjects the violator to a penalty of up to \$37,500 per day. In addition to civil penalties, Waste Action Project will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 USC § 1365(a) and (d), and such other relief as is permitted by law. Also, Section 505(d) of the CWA, 33 USC § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Waste Action Project believes that this NOTICE OF INTENT TO SUE sufficiently states grounds for filing suit. Waste Action Project intends, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against Overlake Oil Center, L.L.C. under Section 505(a) of the Clean Water Act.

Waste Action Project is willing to discuss effective remedies for the violations described in this letter and settlement terms during the 60-day notice period. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within 10 days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends.

Very truly yours,

SMITH & LOWNEY, PLLC

By:   
Meredith A. Crafton

cc: Gina McCarthy, Administrator, U.S. EPA  
Dennis McLerran, Region 10 Administrator, U.S. EPA  
Maia Bellon, Director, Washington Department of Ecology

Date      Precipitation    Event  
                  (inches)

**Precipitation Data**  
**Kirkland, WA (KBFI)**  
 Source:  
<http://www.wunderground.com/>

**2010 Precipitation Data**

**January**

1/1/2010	0.39	Rain
1/2/2010	0.05	Rain
1/3/2010	0.02	Rain
1/4/2010	0.82	Rain
1/5/2010	0.09	Rain
1/6/2010	0	
1/7/2010	0.03	Rain
1/8/2010	0.91	Rain
1/9/2010	0.07	Rain
1/10/2010	0.1	Rain
1/11/2010	1.03	Rain
1/12/2010	0.63	Rain
1/13/2010	0.39	Rain
1/14/2010	0.31	Rain
1/15/2010	0.52	Rain
1/16/2010	0.02	Fog-Rain
1/17/2010	0.12	Rain
1/18/2010	0	Rain
1/19/2010	0.02	Rain
1/20/2010	0.01	
1/21/2010	0	

Precipitation Data

Date      Precipitation    Event  
                  (inches)

1/22/2010	0	
1/23/2010	0.01	Rain
1/24/2010	0.35	Rain
1/25/2010	0.12	Rain
1/26/2010	0	
1/27/2010	0	Fog
1/28/2010	0	
1/29/2010	0.02	Rain
1/30/2010	0.2	Rain
1/31/2010	0.06	Rain

**February**

2/1/2010	0.06	Fog-Rain
2/2/2010	0.02	Rain
2/3/2010	0.27	Rain
2/4/2010	0.08	Rain
2/5/2010	0.08	Rain
2/6/2010	0.24	Rain
2/7/2010	0.09	Rain
2/8/2010	0	Rain
2/9/2010	0	Fog
2/10/2010	0.08	Fog-Rain
2/11/2010	0.23	Rain
2/12/2010	0.43	Rain
2/13/2010	0.23	Rain
2/14/2010	0.66	Rain
2/15/2010	0.04	Fog-Rain
2/16/2010	0.19	Rain

Kirkland, WA (KBFI)

Date      Precipitation    Event  
                  (inches)

2/17/2010	0	
2/18/2010	0	
2/19/2010	0	
2/20/2010	0	
2/21/2010	0	
2/22/2010	0	
2/23/2010	0.14	Rain
2/24/2010	0.11	Rain
2/25/2010	0.06	Rain
2/26/2010	0.49	Rain
2/27/2010	0.09	Rain

**March**

3/1/2010	0	
3/2/2010	0.06	Rain
3/3/2010	0	
3/4/2010	0	Rain
3/5/2010	0	
3/6/2010	0	
3/7/2010	0.05	Rain
3/8/2010	0.04	Rain
3/9/2010	0	Rain
3/10/2010	0.03	Rain
3/11/2010	0.49	Rain
3/12/2010	0.57	Rain
3/13/2010	0.01	Rain
3/14/2010	0	Rain

<http://www.wunderground.com/>



Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
3/15/2010	0.01	Rain	4/10/2010	0		5/6/2010	0	
3/16/2010	0.06	Rain	4/11/2010	0		5/7/2010	0	
3/17/2010	0.01		4/12/2010	0		5/8/2010	0	
3/18/2010	0		4/13/2010	0.08	Rain	5/9/2010	0	
3/19/2010	0		4/14/2010	0		5/10/2010	0.16	Rain
3/20/2010	0		4/15/2010	0	Rain	5/11/2010	0.01	
3/21/2010	0.03	Rain	4/16/2010	0.01	Rain	5/12/2010	0	
3/22/2010	0	Rain	4/17/2010	0.18	Rain	5/13/2010	0	
3/23/2010	0		4/18/2010	0.01		5/14/2010	0	
3/24/2010	0		4/19/2010	0		5/15/2010	0	
3/25/2010	0.43	Rain	4/20/2010	0.01	Rain	5/16/2010	0	Rain
3/26/2010	0		4/21/2010	0.65	Rain	5/17/2010	0.01	
3/27/2010	0		4/22/2010	0		5/18/2010	0.18	Rain
3/28/2010	0.65	Rain	4/23/2010	0.11	Rain	5/19/2010	0.28	Rain
3/29/2010	0.83	T-storm	4/24/2010	0.01	Rain	5/20/2010	0.13	Rain
3/30/2010	0.08	Rain	4/25/2010	0		5/21/2010	0.04	Rain
3/31/2010	0.01		4/26/2010	0.29	Rain	5/22/2010	0.09	Rain
<b>April</b>			4/27/2010	0.29	Rain	5/23/2010	0.18	Rain
4/1/2010	0.08	Rain	4/28/2010	0.26	Rain	5/24/2010	0	
4/2/2010	0.68	Rain	4/29/2010	0		5/25/2010	0.07	Rain
4/3/2010	0.17	Rain	4/30/2010	0.03	Rain	5/26/2010	0.28	Rain
4/4/2010	0.08	Rain	<b>May</b>			5/27/2010	0.04	Rain
4/5/2010	0.14	Rain	5/1/2010	0	Rain	5/28/2010	0.3	Rain
4/6/2010	0		5/2/2010	0.08	Rain	5/29/2010	0.04	Rain
4/7/2010	0.11	Rain	5/3/2010	0.09	Rain	5/30/2010	0.08	Rain
4/8/2010	0.09	Rain	5/4/2010	0.44	Rain	5/31/2010	0.22	Rain
4/9/2010	0.07	Rain	5/5/2010	0.2	Rain	<b>June</b>		

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
6/1/2010	0.07	Rain	6/28/2010	0		7/24/2010	0	
6/2/2010	0.21	Rain	6/29/2010	0		7/25/2010	0	
6/3/2010	0.01	Rain	6/30/2010	0		7/26/2010	0	
6/4/2010	0.29	Rain	<b>July</b>			7/27/2010	0	
6/5/2010	0.04	Rain	7/1/2010	0.02	Rain	7/28/2010	0	
6/6/2010	0.26	Rain	7/2/2010	0.17	Rain	7/29/2010	0	
6/7/2010	0.06	Rain	7/3/2010	0		7/30/2010	0	Fog
6/8/2010	0.23	Rain	7/4/2010	0.07	Rain	7/31/2010	0	
6/9/2010	0.22	Rain	7/5/2010	0	Rain	<b>August</b>		
6/10/2010	0.08	Rain	7/6/2010	0		8/1/2010	0	
6/11/2010	0.01	Rain	7/7/2010	0		8/2/2010	0	
6/12/2010	0		7/8/2010	0		8/3/2010	0	
6/13/2010	0		7/9/2010	0		8/4/2010	0	
6/14/2010	0		7/10/2010	0		8/5/2010	0.04	Rain
6/15/2010	0.17	Rain	7/11/2010	0		8/6/2010	0	
6/16/2010	0.22	Rain	7/12/2010	0	Rain	8/7/2010	0.16	Rain
6/17/2010	0		7/13/2010	0		8/8/2010	0.01	Rain
6/18/2010	0		7/14/2010	0		8/9/2010	0	Rain
6/19/2010	0.03	Rain	7/15/2010	0		8/10/2010	0	
6/20/2010	0.17	Rain	7/16/2010	0		8/11/2010	0	
6/21/2010	0		7/17/2010	0		8/12/2010	0	
6/22/2010	0		7/18/2010	0		8/13/2010	0	
6/23/2010	0		7/19/2010	0		8/14/2010	0	
6/24/2010	0		7/20/2010	0		8/15/2010	0	
6/25/2010	0		7/21/2010	0		8/16/2010	0	
6/26/2010	0		7/22/2010	0		8/17/2010	0	
6/27/2010	0	Rain	7/23/2010	0		8/18/2010	0	



Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
8/19/2010	0		9/14/2010	0		10/10/2010	0.92	Rain
8/20/2010	0		9/15/2010	0.21	Rain	10/11/2010	0	
8/21/2010	0.01	Rain	9/16/2010	0.44	Rain	10/12/2010	0	
8/22/2010	0	Rain	9/17/2010	0.7	Fog-Rain	10/13/2010	0.01	
8/23/2010	0		9/18/2010	0.91	Rain	10/14/2010	0.13	Rain
8/24/2010	0		9/19/2010	0.63	Rain	10/15/2010	0	Rain
8/25/2010	0		9/20/2010	0	Rain	10/16/2010	0	
8/26/2010	0	Rain	9/21/2010	0		10/17/2010	0	
8/27/2010	0		9/22/2010	0		10/18/2010	0	
8/28/2010	0		9/23/2010	0.2	Rain	10/19/2010	0	
8/29/2010	0		9/24/2010	0.03	Rain	10/20/2010	0.01	
8/30/2010	0		9/25/2010	0		10/21/2010	0.01	Rain
8/31/2010	0.37	Rain	9/26/2010	0.27	Rain	10/22/2010	0.13	Rain
<b>September</b>			9/27/2010	0.04	Rain	10/23/2010	0.45	Rain
9/1/2010	0		9/28/2010	0.01	Rain	10/24/2010	0.68	Rain
9/2/2010	0		9/29/2010	0		10/25/2010	0.41	Rain
9/3/2010	0		9/30/2010	0		10/26/2010	0.17	Rain
9/4/2010	0.02	Rain	<b>October</b>			10/27/2010	0	
9/5/2010	0		10/1/2010	0		10/28/2010	0.09	Rain
9/6/2010	0.12	Rain	10/2/2010	0		10/29/2010	0.03	Rain
9/7/2010	0.01	Rain	10/3/2010	0		10/30/2010	0.41	Rain
9/8/2010	0.25	Rain	10/4/2010	0		10/31/2010	0.06	Rain
9/9/2010	0.02	Rain	10/5/2010	0		<b>November</b>		
9/10/2010	0		10/6/2010	0.01		11/1/2010	1.35	Rain
9/11/2010	0		10/7/2010	0		11/2/2010	0	
9/12/2010	0		10/8/2010	0.08	Rain	11/3/2010	0	
9/13/2010	0		10/9/2010	1.01	Rain	11/4/2010	0	
Precipitation Data			Kirkland, WA (KBFI)			<a href="http://www.wunderground.com/">http://www.wunderground.com/</a>		

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
11/5/2010	0.07	Rain	12/1/2010	0		12/28/2010	0	Rain
11/6/2010	0.69	Rain	12/2/2010	0.01	Fog-Rain	12/29/2010	0	Rain
11/7/2010	0.03	Rain	12/3/2010	0		12/30/2010	0	
11/8/2010	0		12/4/2010	0		12/31/2010	0	
11/9/2010	0.19	Rain	12/5/2010	0		<b>2011 Precipitation Data</b>		
11/10/2010	0		12/6/2010	0		<b>January</b>		
11/11/2010	0.08	Rain	12/7/2010	0.47	Rain	1/1/2011	0	
11/12/2010	0		12/8/2010	0.74	Rain	1/2/2011	0	
11/13/2010	0.12	Rain	12/9/2010	0.99	Rain	1/3/2011	0	
11/14/2010	0.34	Rain	12/10/2010	0		1/4/2011	0.03	Rain
11/15/2010	0.04	Rain	12/11/2010	1.37	Rain	1/5/2011	0.11	Rain
11/16/2010	0		12/12/2010	2.24	Rain	1/6/2011	0.28	Rain
11/17/2010	0.12	Rain	12/13/2010	0.34	Rain	1/7/2011	0.52	Rain
11/18/2010	0.14	Rain	12/14/2010	0.57	Rain	1/8/2011	0.01	
11/19/2010	0.08	Rain	12/15/2010	0.09	Rain	1/9/2011	0.03	Rain
11/20/2010	0.01	Rain	12/16/2010	0.02	Rain	1/10/2011	0	
11/21/2010	0	Snow	12/17/2010	0		1/11/2011	0.12	Fog-Snow
11/22/2010	0.07	Fog-Snow	12/18/2010	0.13	Rain	1/12/2011	0.74	Rain-Snow
11/23/2010	0	Rain-Snow	12/19/2010	0.14	Rain	1/13/2011	0.66	Rain
11/24/2010	0		12/20/2010	0.07	Rain	1/14/2011	0.08	Rain
11/25/2010	0.01	Snow	12/21/2010	0.04	Rain	1/15/2011	0.42	Rain
11/26/2010	0.39	Rain	12/22/2010	0.02	Rain	1/16/2011	0.11	Rain
11/27/2010	0.01		12/23/2010	0.43	Rain	1/17/2011	0	Rain
11/28/2010	0.05	Rain	12/24/2010	0.44	Rain	1/18/2011	0.08	Rain
11/29/2010	0.09	Rain	12/25/2010	0.28	Rain	1/19/2011	0	
11/30/2010	0.69	Rain	12/26/2010	0.24	Rain	1/20/2011	0.05	Rain
<b>December</b>			12/27/2010	0.46	Rain	1/21/2011	0.68	Rain
Precipitation Data			Kirkland, WA (KBFI)			<a href="http://www.wunderground.com/">http://www.wunderground.com/</a>		



Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
1/22/2011	0		2/17/2011	0.02	Rain	3/15/2011	0.43	Rain-T-storm
1/23/2011	0.04	Rain	2/18/2011	0		3/16/2011	0.22	Rain
1/24/2011	0.26	Rain	2/19/2011	0		3/17/2011	0	
1/25/2011	0		2/20/2011	0		3/18/2011	0.18	Rain
1/26/2011	0		2/21/2011	0.06		3/19/2011	0	
1/27/2011	0	Fog	2/22/2011	0.2	Rain-Snow	3/20/2011	0.01	Rain
1/28/2011	0.07	Rain	2/23/2011	0.08	Fog-Snow	3/21/2011	0.01	Rain
1/29/2011	0.26	Rain	2/24/2011	0.01	Snow	3/22/2011	0	
1/30/2011	0		2/25/2011	0		3/23/2011	0	
1/31/2011	0		2/26/2011	0	Snow	3/24/2011	0.04	Rain
<b>February</b>			2/27/2011	0.51	Rain	3/25/2011	0.11	Rain
2/1/2011	0	Rain	2/28/2011	0.22	Rain	3/26/2011	0.08	Fog-Rain
2/2/2011	0		<b>March</b>			3/27/2011	0.19	Rain
2/3/2011	0.02	Rain	3/1/2011	0.22	Rain	3/28/2011	0.11	Rain
2/4/2011	0.06	Rain	3/2/2011	0.14	Rain	3/29/2011	0.13	Rain
2/5/2011	0.09	Rain	3/3/2011	0.35	Rain	3/30/2011	0.09	Rain
2/6/2011	0.11	Rain	3/4/2011	0.12	Rain	3/31/2011	0.11	Rain
2/7/2011	0.06	Rain	3/5/2011	0	Rain	<b>April</b>		
2/8/2011	0.01		3/6/2011	0		4/1/2011	0.85	Rain
2/9/2011	0		3/7/2011	0	Rain	4/2/2011	0.25	Rain
2/10/2011	0		3/8/2011	0.1	Rain	4/3/2011	0.07	Rain
2/11/2011	0		3/9/2011	1.47	Rain	4/4/2011	0.12	Rain
2/12/2011	0.45	Rain	3/10/2011	0.41	Rain	4/5/2011	0.15	Rain
2/13/2011	0.28	Rain	3/11/2011	0		4/6/2011	0.1	Rain
2/14/2011	0.84	Rain	3/12/2011	0.47	Rain	4/7/2011	0.09	Rain
2/15/2011	0.15	Rain	3/13/2011	0.65	Rain	4/8/2011	0	
2/16/2011	0.04	Rain	3/14/2011	0.3	Rain	4/9/2011	0	
Precipitation Data			Kirkland, WA (KBFI)			<a href="http://www.wunderground.com/">http://www.wunderground.com/</a>		

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
4/10/2011	0.09	Rain	5/6/2011	0.12	Rain	6/1/2011	0.24	Rain
4/11/2011	0.04	Rain	5/7/2011	0.04	Rain	6/2/2011	0.25	Rain
4/12/2011	0		5/8/2011	0.17	Rain	6/3/2011	0	
4/13/2011	0.07	Rain	5/9/2011	0		6/4/2011	0	
4/14/2011	0.39	Rain	5/10/2011	0		6/5/2011	0	
4/15/2011	0.02	Rain	5/11/2011	0.51	Rain	6/6/2011	0	
4/16/2011	0.15	Rain	5/12/2011	0		6/7/2011	0.1	Rain
4/17/2011	0		5/13/2011	0		6/8/2011	0	Rain
4/18/2011	0.02		5/14/2011	0.52	Rain	6/9/2011	0	
4/19/2011	0		5/15/2011	0.69	Rain	6/10/2011	0	
4/20/2011	0		5/16/2011	0		6/11/2011	0	
4/21/2011	0.04	Rain	5/17/2011	0	Fog	6/12/2011	0	Rain
4/22/2011	0		5/18/2011	0		6/13/2011	0.03	Rain
4/23/2011	0		5/19/2011	0		6/14/2011	0	
4/24/2011	0.05	Rain	5/20/2011	0		6/15/2011	0.11	Rain
4/25/2011	0.45	Rain	5/21/2011	0.1	Rain	6/16/2011	0	
4/26/2011	0.03	Rain	5/22/2011	0	Rain	6/17/2011	0	
4/27/2011	0.44	Rain	5/23/2011	0		6/18/2011	0.3	Rain
4/28/2011	0.04	Rain	5/24/2011	0		6/19/2011	0.03	Rain
4/29/2011	0.04	Rain	5/25/2011	0.24	Rain	6/20/2011	0	Rain
4/30/2011	0.17	Rain	5/26/2011	0.04	Rain	6/21/2011	0	
<b>May</b>			5/27/2011	0.09	Rain	6/22/2011	0	
5/1/2011	0		5/28/2011	0	Rain	6/23/2011	0.01	Rain
5/2/2011	0.22	Rain	5/29/2011	0		6/24/2011	0.12	Rain
5/3/2011	0	Rain	5/30/2011	0		6/25/2011	0	
5/4/2011	0		5/31/2011	0.06	Rain	6/26/2011	0	
5/5/2011	0.04	Rain	<b>June</b>			6/27/2011	0	Rain



Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
6/28/2011	0		7/24/2011	0		8/19/2011	0	
6/29/2011	0		7/25/2011	0.27	Rain	8/20/2011	0	
6/30/2011	0		7/26/2011	0		8/21/2011	0	
<b>July</b>			7/27/2011	0	Rain	8/22/2011	0.08	Rain
7/1/2011	0		7/28/2011	0		8/23/2011	0	
7/2/2011	0		7/29/2011	0		8/24/2011	0	
7/3/2011	0	Rain	7/30/2011	0		8/25/2011	0	
7/4/2011	0		7/31/2011	0		8/26/2011	0	
7/5/2011	0		<b>August</b>			8/27/2011	0	
7/6/2011	0		8/1/2011	0		8/28/2011	0	
7/7/2011	0.01	Rain	8/2/2011	0		8/29/2011	0	
7/8/2011	0		8/3/2011	0		8/30/2011	0	Rain
7/9/2011	0		8/4/2011	0		8/31/2011	0	
7/10/2011	0		8/5/2011	0		<b>September</b>		
7/11/2011	0	Rain	8/6/2011	0		9/1/2011	0	
7/12/2011	0.09	Rain	8/7/2011	0		9/2/2011	0	
7/13/2011	0.01		8/8/2011	0		9/3/2011	0	
7/14/2011	0	Rain	8/9/2011	0		9/4/2011	0	
7/15/2011	0.04	Rain	8/10/2011	0		9/5/2011	0	
7/16/2011	0.33	Rain	8/11/2011	0		9/6/2011	0	
7/17/2011	0.06	Rain	8/12/2011	0	Rain	9/7/2011	0	
7/18/2011	0		8/13/2011	0		9/8/2011	0	
7/19/2011	0		8/14/2011	0		9/9/2011	0	
7/20/2011	0		8/15/2011	0		9/10/2011	0	
7/21/2011	0		8/16/2011	0		9/11/2011	0	
7/22/2011	0		8/17/2011	0		9/12/2011	0	
7/23/2011	0		8/18/2011	0		9/13/2011	0	
Precipitation Data			Kirkland, WA (KBFI)			<a href="http://www.wunderground.com/">http://www.wunderground.com/</a>		

Date	Precipitation Event	(inches)
9/14/2011	0	
9/15/2011	0	
9/16/2011	0	
9/17/2011	0.21	Rain
9/18/2011	0.13	Rain
9/19/2011	0.06	Rain
9/20/2011	0	
9/21/2011	0	
9/22/2011	0	
9/23/2011	0	
9/24/2011	0	
9/25/2011	0.22	Rain
9/26/2011	0.32	Rain
9/27/2011	0.04	Rain
9/28/2011	0.01	
9/29/2011	0	
9/30/2011	0.02	
<b>October</b>		
10/1/2011	0	
10/2/2011	0.14	Rain
10/3/2011	0.09	Rain
10/4/2011	0.02	Rain
10/5/2011	0.1	Rain
10/6/2011	0.19	Rain
10/7/2011	0.05	Rain
10/8/2011	0.01	Rain
10/9/2011	0.06	Rain

Date	Precipitation Event	(inches)
10/10/2011	0.18	Rain
10/11/2011	0.57	Rain
10/12/2011	0.01	Rain
10/13/2011	0	
10/14/2011	0.01	
10/15/2011	0	
10/16/2011	0	
10/17/2011	0	
10/18/2011	0	
10/19/2011	0	Rain
10/20/2011	0	
10/21/2011	0.03	Rain
10/22/2011	0.28	Rain
10/23/2011	0	
10/24/2011	0.02	Rain
10/25/2011	0	Fog
10/26/2011	0.01	Rain
10/27/2011	0	Fog
10/28/2011	0.38	Rain
10/29/2011	0	
10/30/2011	0.14	Rain
10/31/2011	0	
<b>November</b>		
11/1/2011	0	
11/2/2011	0.42	Fog-Rain
11/3/2011	0	
11/4/2011	0.06	Rain

Date	Precipitation Event	(inches)
11/5/2011	0	
11/6/2011	0	Fog
11/7/2011	0.01	Rain
11/8/2011	0	
11/9/2011	0	Rain
11/10/2011	0	
11/11/2011	0.3	Rain
11/12/2011	0.15	Rain
11/13/2011	0.09	Rain
11/14/2011	0	
11/15/2011	0	
11/16/2011	0.38	Rain
11/17/2011	0.1	Rain
11/18/2011	0.01	Rain
11/19/2011	0	
11/20/2011	0	
11/21/2011	0.42	Rain
11/22/2011	1.58	Rain
11/23/2011	1	Rain
11/24/2011	0.35	Rain
11/25/2011	0	
11/26/2011	0.03	Rain
11/27/2011	0.33	Rain
11/28/2011	0	Rain
11/29/2011	0.05	Rain
11/30/2011	0	
<b>December</b>		



Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
12/1/2011	0	Fog	12/28/2011	0.47	Rain	1/22/2012	0.29	Rain
12/2/2011	0	Rain	12/29/2011	0.21	Rain	1/23/2012	0	
12/3/2011	0		12/30/2011	0.02	Rain	1/24/2012	0.24	Rain
12/4/2011	0		12/31/2011	0		1/25/2012	0.4	Rain
12/5/2011	0	Fog	<b>2012 Precipitation Data</b>			1/26/2012	0.31	Rain
12/6/2011	0	Fog	<b>January</b>			1/27/2012	0	
12/7/2011	0		1/1/2012	0		1/28/2012	0	
12/8/2011	0		1/2/2012	0.48	Rain	1/29/2012	0.67	Rain
12/9/2011	0		1/3/2012	0.03	Rain	1/30/2012	0.11	Rain
12/10/2011	0.01	Rain	1/4/2012	0.65	Rain	1/31/2012	0.04	Rain
12/11/2011	0.05	Rain	1/5/2012	0.08	Rain	<b>February</b>		
12/12/2011	0	Fog	1/6/2012	0.04	Rain	2/1/2012	0.45	Rain
12/13/2011	0	Fog	1/7/2012	0	Rain	2/2/2012	0	
12/14/2011	0.01	Rain	1/8/2012	0		2/3/2012	0	
12/15/2011	0.03	Rain	1/9/2012	0.17	Rain	2/4/2012	0	
12/16/2011	0		1/10/2012	0.06	Rain	2/5/2012	0	
12/17/2011	0	Fog	1/11/2012	0		2/6/2012	0	
12/18/2011	0.08	Rain	1/12/2012	0		2/7/2012	0	Rain
12/19/2011	0	Fog	1/13/2012	0		2/8/2012	0.1	Rain
12/20/2011	0		1/14/2012	0.13	Rain	2/9/2012	0.11	Rain
12/21/2011	0	Fog	1/15/2012	0.23	Fog-Snow	2/10/2012	0.09	Rain
12/22/2011	0	Fog	1/16/2012	0.07	Rain-Snow	2/11/2012	0	
12/23/2011	0.01	Rain	1/17/2012	0.09	Rain	2/12/2012	0.04	Rain
12/24/2011	0.01	Rain	1/18/2012	0.44	Fog-Rain-Snow	2/13/2012	0.44	Rain
12/25/2011	0.04	Rain	1/19/2012	0.32	Rain-Snow	2/14/2012	0.04	Rain
12/26/2011	0.03	Rain	1/20/2012	0.39	Rain	2/15/2012	0	
12/27/2011	0.03	Rain	1/21/2012	0.06	Rain	2/16/2012	0.04	Rain

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
2/17/2012	0.4	Rain	3/14/2012	0.44	Rain	4/9/2012	0	
2/18/2012	0.18	Rain	3/15/2012	1.07	Rain	4/10/2012	0	Rain
2/19/2012	0		3/16/2012	0.19	Rain	4/11/2012	0.08	Rain
2/20/2012	0	Rain	3/17/2012	0.44	Rain-Snow	4/12/2012	0	
2/21/2012	0	Rain	3/18/2012	0.08	Rain	4/13/2012	0	
2/22/2012	0.22	Rain	3/19/2012	0.03	Rain	4/14/2012	0	
2/23/2012	0		3/20/2012	0.12	Rain	4/15/2012	0	
2/24/2012	0.49	Rain	3/21/2012	0	Rain	4/16/2012	0.24	Rain
2/25/2012	0.01		3/22/2012	0.16	Rain	4/17/2012	0.07	Rain
2/26/2012	0		3/23/2012	0		4/18/2012	0.09	Rain
2/27/2012	0		3/24/2012	0		4/19/2012	0.28	Rain
2/28/2012	0.18	Rain-Snow	3/25/2012	0		4/20/2012	0.26	Rain
2/29/2012	0.08	Rain-Snow	3/26/2012	0		4/21/2012	0	
<b>March</b>			3/27/2012	0.21	Rain	4/22/2012	0	
3/1/2012	0		3/28/2012	0.15	Rain	4/23/2012	0	
3/2/2012	0.04	Rain	3/29/2012	1.15	Rain	4/24/2012	0.03	Rain
3/3/2012	0		3/30/2012	0.08	Rain	4/25/2012	0.41	Rain
3/4/2012	0		3/31/2012	0	Rain	4/26/2012	0.16	Rain
3/5/2012	0.36	Rain	<b>April</b>			4/27/2012	0.01	Rain
3/6/2012	0.05	Snow	4/1/2012	0	Rain	4/28/2012	0	Rain
3/7/2012	0		4/2/2012	0		4/29/2012	0.08	Rain
3/8/2012	0		4/3/2012	0	Rain	4/30/2012	0.26	Rain
3/9/2012	0.17	Rain	4/4/2012	0		<b>May</b>		
3/10/2012	0.46	Rain	4/5/2012	0	Rain	5/1/2012	0.05	Rain
3/11/2012	0.31	Rain	4/6/2012	0		5/2/2012	0	
3/12/2012	0.66	Rain	4/7/2012	0		5/3/2012	0.78	Rain
3/13/2012	0.23	Rain-Snow	4/8/2012	0		5/4/2012	0.32	Rain



Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
5/5/2012	0		<b>June</b>			6/27/2012	0	
5/6/2012	0		6/1/2012	0.1	Rain	6/28/2012	0	Rain
5/7/2012	0		6/2/2012	0.02	Rain	6/29/2012	0	Rain
5/8/2012	0		6/3/2012	0		6/30/2012	0	Rain
5/9/2012	0.01	Rain	6/4/2012	0.03	Rain	<b>July</b>		
5/10/2012	0		6/5/2012	0.49	Rain	7/1/2012	0	Rain
5/11/2012	0		6/6/2012	0		7/2/2012	0	Rain
5/12/2012	0		6/7/2012	0.54	Rain	7/3/2012	0	Rain
5/13/2012	0		6/8/2012	0.05	Rain-T-storm	7/4/2012	0	
5/14/2012	0		6/9/2012	0.02		7/5/2012	0	
5/15/2012	0		6/10/2012	0		7/6/2012	0	
5/16/2012	0		6/11/2012	0		7/7/2012	0	
5/17/2012	0.47	Rain	6/12/2012	0.03	Rain	7/8/2012	0	
5/18/2012	0		6/13/2012	0		7/9/2012	0	
5/19/2012	0		6/14/2012	0		7/10/2012	0	
5/20/2012	0.16	Rain	6/15/2012	0		7/11/2012	0	
5/21/2012	0.41	Rain	6/16/2012	0	Rain	7/12/2012	0	
5/22/2012	0.12	Rain	6/17/2012	0		7/13/2012	0	T-storm
5/23/2012	0.02	Rain	6/18/2012	0.21	Rain	7/14/2012	0	
5/24/2012	0.01	Rain	6/19/2012	0.03	Rain	7/15/2012	0	
5/25/2012	0.05		6/20/2012	0		7/16/2012	0	
5/26/2012	0		6/21/2012	0		7/17/2012	0	Rain
5/27/2012	0		6/22/2012	0.31	Rain	7/18/2012	0	
5/28/2012	0		6/23/2012	0.6	Rain	7/19/2012	0	
5/29/2012	0		6/24/2012	0.01		7/20/2012	0.61	Rain-T-storm
5/30/2012	0.02	Rain	6/25/2012	0	Rain	7/21/2012	0	
5/31/2012	0.15	Rain	6/26/2012	0.01	Rain	7/22/2012	0	Rain
Precipitation Data			Kirkland, WA (KBFI)			<a href="http://www.wunderground.com/">http://www.wunderground.com/</a>		12

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
7/23/2012	0		8/18/2012	0		9/13/2012	0	
7/24/2012	0		8/19/2012	0		9/14/2012	0	
7/25/2012	0		8/20/2012	0		9/15/2012	0	
7/26/2012	0		8/21/2012	0		9/16/2012	0	
7/27/2012	0		8/22/2012	0		9/17/2012	0	
7/28/2012	0		8/23/2012	0		9/18/2012	0	
7/29/2012	0		8/24/2012	0		9/19/2012	0	
7/30/2012	0		8/25/2012	0		9/20/2012	0	Fog
7/31/2012	0		8/26/2012	0		9/21/2012	0	
<b>August</b>			8/27/2012	0		9/22/2012	0.02	Rain
8/1/2012	0		8/28/2012	0		9/23/2012	0	
8/2/2012	0		8/29/2012	0		9/24/2012	0	
8/3/2012	0		8/30/2012	0		9/25/2012	0	
8/4/2012	0		8/31/2012	0		9/26/2012	0	
8/5/2012	0		<b>September</b>			9/27/2012	0	
8/6/2012	0		9/1/2012	0		9/28/2012	0	
8/7/2012	0		9/2/2012	0		9/29/2012	0	Rain
8/8/2012	0		9/3/2012	0		9/30/2012	0	
8/9/2012	0		9/4/2012	0		<b>October</b>		
8/10/2012	0		9/5/2012	0		10/1/2012	0	
8/11/2012	0		9/6/2012	0		10/2/2012	0	
8/12/2012	0		9/7/2012	0		10/3/2012	0	
8/13/2012	0		9/8/2012	0		10/4/2012	0	
8/14/2012	0		9/9/2012	0		10/5/2012	0	
8/15/2012	0		9/10/2012	0.02	Rain	10/6/2012	0	
8/16/2012	0		9/11/2012	0		10/7/2012	0	
8/17/2012	0		9/12/2012	0		10/8/2012	0	



Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
10/9/2012	0		11/4/2012	0.17	Rain	<b>December</b>		
10/10/2012	0		11/5/2012	0.05	Rain	12/1/2012	0.28	Rain
10/11/2012	0		11/6/2012	0.01		12/2/2012	1	Rain
10/12/2012	0.09	Rain	11/7/2012	0		12/3/2012	0.41	Rain
10/13/2012	0.09	Rain	11/8/2012	0		12/4/2012	0.46	Rain
10/14/2012	0.52	Rain	11/9/2012	0		12/5/2012	0.02	Rain
10/15/2012	0.22	Rain	11/10/2012	0		12/6/2012	0.07	Rain
10/16/2012	0		11/11/2012	0.55	Rain	12/7/2012	0.14	Rain
10/17/2012	0		11/12/2012	0.13	Rain	12/8/2012	0	
10/18/2012	0.64	Rain	11/13/2012	0.19	Rain	12/9/2012	0.06	Rain
10/19/2012	0.1	Rain	11/14/2012	0		12/10/2012	0	
10/20/2012	0.18	Rain-T-storm	11/15/2012	0	Fog	12/11/2012	0.1	Rain
10/21/2012	0.14	Rain	11/16/2012	0.25	Fog-Rain	12/12/2012	0.28	Rain
10/22/2012	0.26	Rain	11/17/2012	0.2	Rain	12/13/2012	0.08	Rain
10/23/2012	0	Rain	11/18/2012	0.63	Rain	12/14/2012	0.25	Rain
10/24/2012	0.19	Rain	11/19/2012	2.49	Rain	12/15/2012	0.24	Rain
10/25/2012	0		11/20/2012	0.22	Rain	12/16/2012	0.92	Rain
10/26/2012	0.06	Rain	11/21/2012	0.52	Rain	12/17/2012	0.11	Rain
10/27/2012	0.75	Rain	11/22/2012	0.02	Rain	12/18/2012	0.05	Rain-Snow
10/28/2012	0.26	Rain	11/23/2012	0.95	Rain	12/19/2012	0.99	Rain-Snow
10/29/2012	0.57	Rain	11/24/2012	0	Rain	12/20/2012	0.64	Rain
10/30/2012	1.2	Rain	11/25/2012	0	Fog	12/21/2012	0.07	Fog-Rain
10/31/2012	0.64	Rain	11/26/2012	0		12/22/2012	0.12	Rain
<b>November</b>			11/27/2012	0		12/23/2012	0.39	Rain
11/1/2012	0.34	Rain	11/28/2012	0.12	Rain	12/24/2012	0.08	Rain
11/2/2012	0.19	Rain	11/29/2012	0.11	Rain	12/25/2012	0.41	Rain
11/3/2012	0.02	Rain	11/30/2012	1.51	Rain	12/26/2012	0.25	Rain

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
12/27/2012	0.27	Rain	1/22/2013	0	Fog	2/17/2013	0	
12/28/2012	0	Rain	1/23/2013	0.21	Rain	2/18/2013	0	Rain
12/29/2012	0.06	Rain	1/24/2013	0.16	Rain	2/19/2013	0	
12/30/2012	0	Fog	1/25/2013	0.09	Rain	2/20/2013	0.07	Rain
12/31/2012	0		1/26/2013	0.16	Rain	2/21/2013	0.01	Rain
<b>January</b>			1/27/2013	0.01	Rain	2/22/2013	0.34	Rain
1/1/2013	0		1/28/2013	0.21	Rain	2/23/2013	0	
1/2/2013	0		1/29/2013	0.29	Rain	2/24/2013	0.02	Rain
1/3/2013	0.18	Rain	1/30/2013	0.06	Rain	2/25/2013	0.14	Rain
1/4/2013	0.07	Rain	1/31/2013	0.08	Rain	2/26/2013	0.01	Rain
1/5/2013	0.1	Rain	<b>February</b>			2/27/2013	0.32	Rain
1/6/2013	0.03	Rain	2/1/2013	0		2/28/2013	0.25	Rain
1/7/2013	0.02	Rain	2/2/2013	0	Fog	<b>March</b>		
1/8/2013	0.53	Rain	2/3/2013	0.08	Rain	3/1/2013	0.04	Rain
1/9/2013	1.15	Rain	2/4/2013	0		3/2/2013	0.21	Rain
1/10/2013	0	Fog-Rain	2/5/2013	0.18	Rain	3/3/2013	0	
1/11/2013	0	Fog	2/6/2013	0.08	Rain	3/4/2013	0	
1/12/2013	0		2/7/2013	0.09	Rain	3/5/2013	0	
1/13/2013	0		2/8/2013	0		3/6/2013	0.61	Rain
1/14/2013	0		2/9/2013	0.01	Rain	3/7/2013	0.26	Rain
1/15/2013	0		2/10/2013	0	Fog	3/8/2013	0	Fog
1/16/2013	0	Fog	2/11/2013	0.01	Rain	3/9/2013	0	Fog
1/17/2013	0	Fog	2/12/2013	0		3/10/2013	0.01	Rain
1/18/2013	0	Fog	2/13/2013	0		3/11/2013	0.03	Rain
1/19/2013	0	Fog	2/14/2013	0.03	Rain	3/12/2013	0.01	Rain
1/20/2013	0	Fog	2/15/2013	0		3/13/2013	0.15	Rain
1/21/2013	0	Fog	2/16/2013	0	Rain	3/14/2013	0.05	Rain



Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
3/15/2013	0		4/10/2013	0.15	Rain	5/6/2013	0	
3/16/2013	0.04	Rain	4/11/2013	0.09	Rain	5/7/2013	0	
3/17/2013	0		4/12/2013	0.18	Rain	5/8/2013	0	
3/18/2013	0	Rain	4/13/2013	0.31	Rain	5/9/2013	0	
3/19/2013	0.37	Rain	4/14/2013	0.06	Rain	5/10/2013	0	
3/20/2013	0.72	Rain	4/15/2013	0		5/11/2013	0	
3/21/2013	0.1	Rain	4/16/2013	0.07	Rain	5/12/2013	0.08	Rain
3/22/2013	0.01	Rain	4/17/2013	0		5/13/2013	0.11	Rain-T-storm
3/23/2013	0		4/18/2013	0.18	Rain	5/14/2013	0	
3/24/2013	0		4/19/2013	0.67	Rain	5/15/2013	0.03	Rain
3/25/2013	0		4/20/2013	0.01	Rain	5/16/2013	0	Rain
3/26/2013	0		4/21/2013	0.03	Rain	5/17/2013	0.02	Rain
3/27/2013	0.01	Rain	4/22/2013	0		5/18/2013	0	
3/28/2013	0.06	Rain	4/23/2013	0		5/19/2013	0	
3/29/2013	0.01	Rain	4/24/2013	0		5/20/2013	0	
3/30/2013	0		4/25/2013	0		5/21/2013	0.39	Rain
3/31/2013	0		4/26/2013	0		5/22/2013	0.21	Rain
<b>April</b>			4/27/2013	0	Rain	5/23/2013	0.08	Rain
4/1/2013	0		4/28/2013	0.08	Rain	5/24/2013	0.02	Rain
4/2/2013	0		4/29/2013	0.15	Rain	5/25/2013	0	Rain
4/3/2013	0		4/30/2013	0		5/26/2013	0.08	Rain
4/4/2013	0.41	Rain	<b>May</b>			5/27/2013	0.2	Rain
4/5/2013	0.44	Rain	5/1/2013	0		5/28/2013	0.01	Rain
4/6/2013	0.44	Rain	5/2/2013	0		5/29/2013	0.17	Rain
4/7/2013	0.96	Rain	5/3/2013	0		5/30/2013	0	
4/8/2013	0.04	Rain	5/4/2013	0		5/31/2013	0	
4/9/2013	0		5/5/2013	0		<b>June</b>		
Precipitation Data			Kirkland, WA (KBFI)			<a href="http://www.wunderground.com/">http://www.wunderground.com/</a>		16

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
6/1/2013	0		6/28/2013	0		7/24/2013	0	
6/2/2013	0	Rain	6/29/2013	0		7/25/2013	0	
6/3/2013	0		6/30/2013	0		7/26/2013	0	
6/4/2013	0		<b>July</b>			7/27/2013	0	
6/5/2013	0		7/1/2013	0		7/28/2013	0	
6/6/2013	0		7/2/2013	0		7/29/2013	0	
6/7/2013	0		7/3/2013	0		7/30/2013	0	
6/8/2013	0		7/4/2013	0		7/31/2013	0	T-storm
6/9/2013	0		7/5/2013	0		<b>August</b>		
6/10/2013	0		7/6/2013	0		8/1/2013	0	
6/11/2013	0	Rain	7/7/2013	0		8/2/2013	0	Rain
6/12/2013	0		7/8/2013	0		8/3/2013	0	
6/13/2013	0		7/9/2013	0		8/4/2013	0	
6/14/2013	0		7/10/2013	0		8/5/2013	0	
6/15/2013	0		7/11/2013	0		8/6/2013	0	
6/16/2013	0		7/12/2013	0		8/7/2013	0	
6/17/2013	0		7/13/2013	0		8/8/2013	0	
6/18/2013	0		7/14/2013	0		8/9/2013	0	
6/19/2013	0	Rain	7/15/2013	0		8/10/2013	0	Rain-T-storm
6/20/2013	0	Rain	7/16/2013	0	Rain	8/11/2013	0	
6/21/2013	0.01	Rain	7/17/2013	0	Rain	8/12/2013	0	
6/22/2013	0		7/18/2013	0		8/13/2013	0	
6/23/2013	0	Rain	7/19/2013	0		8/14/2013	0	Rain
6/24/2013	0.01	Rain	7/20/2013	0		8/15/2013	0	Rain
6/25/2013	0.01	Rain-T-storm	7/21/2013	0		8/16/2013	0	
6/26/2013	0.56	Rain	7/22/2013	0		8/17/2013	0	
6/27/2013	0.13	Rain	7/23/2013	0		8/18/2013	0	
Precipitation Data			Kirkland, WA (KBFI)			<a href="http://www.wunderground.com/">http://www.wunderground.com/</a>		17



Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
8/19/2013	0		9/14/2013	0		10/10/2013	0.03	Rain
8/20/2013	0		9/15/2013	0.21	Rain-T-storm	10/11/2013	0.53	Rain
8/21/2013	0		9/16/2013	0		10/12/2013	0.06	Rain
8/22/2013	0		9/17/2013	0		10/13/2013	0	
8/23/2013	0		9/18/2013	0		10/14/2013	0.01	Fog
8/24/2013	0		9/19/2013	0		10/15/2013	0	Fog
8/25/2013	0		9/20/2013	0.15	Rain	10/16/2013	0	
8/26/2013	0	Rain	9/21/2013	0.01		10/17/2013	0.01	
8/27/2013	0	Rain	9/22/2013	0.37	Rain	10/18/2013	0	Fog
8/28/2013	0	Rain	9/23/2013	0.08	Rain	10/19/2013	0	Fog
8/29/2013	0.38	Rain-T-storm	9/24/2013	0.01		10/20/2013	0	
8/30/2013	0		9/25/2013	0.04	Rain	10/21/2013	0	
8/31/2013	0		9/26/2013	0.01	Fog	10/22/2013	0	Fog
<b>September</b>			9/27/2013	0.05	Rain	10/23/2013	0.01	Fog
9/1/2013	0		9/28/2013	1.21	Rain	10/24/2013	0.01	Fog
9/2/2013	0		9/29/2013	0.62	Rain	10/25/2013	0	
9/3/2013	0.12	Rain	9/30/2013	0.63	Rain	10/26/2013	0.01	Fog
9/4/2013	0	Rain	<b>October</b>			10/27/2013	0.06	Rain
9/5/2013	0.46	Rain-T-storm	10/1/2013	0.08	Rain	10/28/2013	0	
9/6/2013	1.08	Rain	10/2/2013	0.19	Rain	10/29/2013	0	
9/7/2013	0	Rain	10/3/2013	0.02	Rain	10/30/2013	0.01	Rain
9/8/2013	0.01		10/4/2013	0.01	Fog	10/31/2013	0.01	Rain
9/9/2013	0		10/5/2013	0	Fog	<b>November</b>		
9/10/2013	0		10/6/2013	0.04	Rain	11/1/2013	0	Rain
9/11/2013	0		10/7/2013	0.1	Rain	11/2/2013	0.38	Rain
9/12/2013	0		10/8/2013	0.39	Rain-T-storm	11/3/2013	0.02	Rain
9/13/2013	0		10/9/2013	0		11/4/2013	0.01	Rain

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
11/5/2013	0.05	Rain	12/1/2013	0.03	Rain	12/28/2013	0	Fog
11/6/2013	0.09	Rain	12/2/2013	0.11	Rain	12/29/2013	0	Fog
11/7/2013	0.94	Rain	12/3/2013	0.01		12/30/2013	0.02	Rain
11/8/2013	0		12/4/2013	0		12/31/2013	0.01	Fog
11/9/2013	0.09	Rain	12/5/2013	0		<b>2014 Precipitation Data</b>		
11/10/2013	0	Rain	12/6/2013	0		<b>January</b>		
11/11/2013	0		12/7/2013	0		1/1/2014	0.01	Fog-Rain
11/12/2013	0.14	Rain	12/8/2013	0		1/2/2014	0.53	Rain
11/13/2013	0		12/9/2013	0	Snow	1/3/2014	0.03	Rain
11/14/2013	0.01	Rain	12/10/2013	0		1/4/2014	0	
11/15/2013	0.08	Rain	12/11/2013	0	Fog	1/5/2014	0	Fog
11/16/2013	0		12/12/2013	0.22	Fog-Rain	1/6/2014	0	
11/17/2013	0.05	Rain	12/13/2013	0.01		1/7/2014	0.34	Rain
11/18/2013	0.8	Rain	12/14/2013	0		1/8/2014	0.44	Rain
11/19/2013	0.11	Rain	12/15/2013	0.03	Rain	1/9/2014	0.09	Rain
11/20/2013	0		12/16/2013	0	Fog	1/10/2014	0.15	Rain
11/21/2013	0		12/17/2013	0		1/11/2014	0.91	Rain
11/22/2013	0		12/18/2013	0.04	Rain	1/12/2014	0.02	Rain
11/23/2013	0.08		12/19/2013	0		1/13/2014	0.01	
11/24/2013	0		12/20/2013	0.1	Rain-Snow	1/14/2014	0	
11/25/2013	0	Fog	12/21/2013	0.22	Rain	1/15/2014	0	
11/26/2013	0	Fog-Rain	12/22/2013	0.21	Rain	1/16/2014	0	
11/27/2013	0		12/23/2013	0.01	Rain	1/17/2014	0	
11/28/2013	0	Fog	12/24/2013	0		1/18/2014	0	
11/29/2013	0.01	Fog	12/25/2013	0	Fog	1/19/2014	0	
11/30/2013	0.06	Rain	12/26/2013	0	Fog	1/20/2014	0	
<b>December</b>			12/27/2013	0.03	Fog-Rain	1/21/2014	0	Fog

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
1/22/2014	0		2/17/2014	0.44	Rain	3/15/2014	0.2	Rain
1/23/2014	0		2/18/2014	0.62	Rain	3/16/2014	1.09	Rain
1/24/2014	0	Fog	2/19/2014	0.02	Rain	3/17/2014	0.01	
1/25/2014	0	Fog	2/20/2014	0.03	Rain	3/18/2014	0.01	
1/26/2014	0	Fog	2/21/2014	0.23	Rain	3/19/2014	0	Rain
1/27/2014	0	Fog	2/22/2014	0.09	Rain	3/20/2014	0	Rain
1/28/2014	0.35	Rain	2/23/2014	0.18	Rain	3/21/2014	0	
1/29/2014	0.77	Rain	2/24/2014	0.39	Rain	3/22/2014	0	
1/30/2014	0.01		2/25/2014	0		3/23/2014	0	
1/31/2014	0.03	Rain	2/26/2014	0		3/24/2014	0	
<b>February</b>			2/27/2014	0		3/25/2014	0.22	Rain
2/1/2014	0.02	Fog-Rain	2/28/2014	0		3/26/2014	0.06	Rain
2/2/2014	0	Fog	<b>March</b>			3/27/2014	0.03	Rain
2/3/2014	0		3/1/2014	0.01	Rain	3/28/2014	0.51	Rain
2/4/2014	0		3/2/2014	0.7	Rain	3/29/2014	0.63	Rain
2/5/2014	0		3/3/2014	0.37	Rain	3/30/2014	0.02	
2/6/2014	0		3/4/2014	0.41	Rain	3/31/2014	0	
2/7/2014	0		3/5/2014	1.44	Rain	<b>April</b>		
2/8/2014	0.09	Snow	3/6/2014	0.21	Rain	4/1/2014	0	
2/9/2014	0.01	Rain-Snow	3/7/2014	0		4/2/2014	0	
2/10/2014	0.54	Rain	3/8/2014	1.12	Rain	4/3/2014	0.11	Rain
2/11/2014	0.75	Rain	3/9/2014	0.26	Rain	4/4/2014	0	Rain
2/12/2014	0.14	Rain	3/10/2014	0.44	Rain	4/5/2014	0.08	Rain
2/13/2014	0	Rain	3/11/2014	0		4/6/2014	0	
2/14/2014	0.41	Rain	3/12/2014	0	Fog	4/7/2014	0	
2/15/2014	0.51	Rain	3/13/2014	0	Rain	4/8/2014	0.37	Rain
2/16/2014	1.41	Rain	3/14/2014	0.11	Rain	4/9/2014	0.01	



Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
4/10/2014	0		5/6/2014	0		6/1/2014	0	
4/11/2014	0		5/7/2014	0		6/2/2014	0	
4/12/2014	0		5/8/2014	0.32	Rain	6/3/2014	0	
4/13/2014	0		5/9/2014	0.07	Rain	6/4/2014	0	
4/14/2014	0		5/10/2014	0		6/5/2014	0	
4/15/2014	0.01	Rain	5/11/2014	0.01		6/6/2014	0	
4/16/2014	0.41	Rain	5/12/2014	0		6/7/2014	0	
4/17/2014	0.7	Rain	5/13/2014	0		6/8/2014	0	
4/18/2014	0		5/14/2014	0		6/9/2014	0	
4/19/2014	0.36	Rain	5/15/2014	0		6/10/2014	0	
4/20/2014	0		5/16/2014	0		6/11/2014	0	
4/21/2014	0.14	Rain	5/17/2014	0		6/12/2014	0	Rain
4/22/2014	0.53	Rain	5/18/2014	0.04	Rain	6/13/2014	0.03	Rain
4/23/2014	0.22	Rain	5/19/2014	0		6/14/2014	0	Rain
4/24/2014	0.3	Rain	5/20/2014	0		6/15/2014	0.01	Rain
4/25/2014	0.05		5/21/2014	0		6/16/2014	0.11	Rain
4/26/2014	0.18	Rain	5/22/2014	0		6/17/2014	0.05	Rain
4/27/2014	0	Rain	5/23/2014	0.16	Rain	6/18/2014	0	
4/28/2014	0		5/24/2014	0		6/19/2014	0	Rain
4/29/2014	0		5/25/2014	0.27	Rain	6/20/2014	0	Rain
4/30/2014	0		5/26/2014	0.01		6/21/2014	0	
<b>May</b>			5/27/2014	0	Rain	6/22/2014	0	
5/1/2014	0		5/28/2014	0.03	Rain	6/23/2014	0	Rain
5/2/2014	0	Rain	5/29/2014	0		6/24/2014	0	
5/3/2014	1.19	Rain	5/30/2014	0		6/25/2014	0	
5/4/2014	0.26	Rain	5/31/2014	0		6/26/2014	0	Rain
5/5/2014	0.24	Rain	<b>June</b>			6/27/2014	0	Rain

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
6/28/2014	0	Rain	7/24/2014	0	Rain	8/19/2014	0	
6/29/2014	0		7/25/2014	0		8/20/2014	0	
6/30/2014	0		7/26/2014	0		8/21/2014	0	
<b>July</b>			7/27/2014	0		8/22/2014	0	
7/1/2014	0		7/28/2014	0		8/23/2014	0	
7/2/2014	0		7/29/2014	0		8/24/2014	0	
7/3/2014	0		7/30/2014	0		8/25/2014	0	
7/4/2014	0		7/31/2014	0		8/26/2014	0	
7/5/2014	0		<b>August</b>			8/27/2014	0	
7/6/2014	0		8/1/2014	0		8/28/2014	0	
7/7/2014	0		8/2/2014	0		8/29/2014	0	
7/8/2014	0		8/3/2014	0		8/30/2014	0	Rain
7/9/2014	0		8/4/2014	0		8/31/2014	0	Rain
7/10/2014	0		8/5/2014	0		<b>September</b>		
7/11/2014	0		8/6/2014	0		9/1/2014	0	Rain
7/12/2014	0		8/7/2014	0		9/2/2014	0	Rain
7/13/2014	0	Rain	8/8/2014	0		9/3/2014	0	
7/14/2014	0		8/9/2014	0		9/4/2014	0	
7/15/2014	0		8/10/2014	0		9/5/2014	0	
7/16/2014	0		8/11/2014	0	Rain	9/6/2014	0	
7/17/2014	0		8/12/2014	0	Rain	9/7/2014	0	
7/18/2014	0		8/13/2014	0	Rain	9/8/2014	0	Rain
7/19/2014	0		8/14/2014	0	Rain	9/9/2014	0	
7/20/2014	0		8/15/2014	0	Rain	9/10/2014	0	
7/21/2014	0	Rain	8/16/2014	0		9/11/2014	0	
7/22/2014	0		8/17/2014	0		9/12/2014	0	
7/23/2014	0	Rain	8/18/2014	0		9/13/2014	0	

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
9/14/2014	0		10/10/2014	0	Fog-Rain	11/5/2014	0.27	Rain
9/15/2014	0		10/11/2014	0	Rain	11/6/2014	0.22	Rain
9/16/2014	0		10/12/2014	0	Rain	11/7/2014	0	
9/17/2014	0	Rain	10/13/2014	0	Rain	11/8/2014	0	
9/18/2014	0	Rain	10/14/2014	0.11	Rain	11/9/2014	0.29	Rain
9/19/2014	0		10/15/2014	0.45	Rain	11/10/2014	0	
9/20/2014	0		10/16/2014	0	Rain	11/11/2014	0	
9/21/2014	0		10/17/2014	0.14	Rain	11/12/2014	0	
9/22/2014	0		10/18/2014	0.31	Rain	11/13/2014	0	
9/23/2014	0	Rain	10/19/2014	0		11/14/2014	0	
9/24/2014	0.66	Rain	10/20/2014	0.44	Rain	11/15/2014	0	
9/25/2014	0.27	Rain	10/21/2014	0.1	Rain	11/16/2014	0	
9/26/2014	0.09	Rain	10/22/2014	1.43	Rain	11/17/2014	0	
9/27/2014	0		10/23/2014	0.35	Rain	11/18/2014	0	
9/28/2014	0		10/24/2014	0.13	Rain	11/19/2014	0	Rain
9/29/2014	0	Fog-Rain	10/25/2014	0.37	Rain	11/20/2014	0.11	Rain
9/30/2014	0	Rain	10/26/2014	0.05	Rain	11/21/2014	0.67	Rain
<b>October</b>			10/27/2014	0.01	Rain	11/22/2014	0.03	Rain
10/1/2014	0		10/28/2014	0.34	Rain	11/23/2014	0.42	Rain
10/2/2014	0		10/29/2014	0.04	Rain	11/24/2014	0.01	Rain
10/3/2014	0		10/30/2014	0.67	Rain	11/25/2014	0.33	Rain
10/4/2014	0		10/31/2014	0.77	Rain	11/26/2014	0.01	Rain
10/5/2014	0		<b>November</b>			11/27/2014	0.04	Rain
10/6/2014	0		11/1/2014	0		11/28/2014	1.39	Rain
10/7/2014	0		11/2/2014	0.11	Rain	11/29/2014	0.06	Rain-Snow
10/8/2014	0		11/3/2014	0.24	Rain	11/30/2014	0	
10/9/2014	0		11/4/2014	0.05	Rain	<b>December</b>		
Precipitation Data			Kirkland, WA (KBFI)			<a href="http://www.wunderground.com/">http://www.wunderground.com/</a>		



Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
12/1/2014	0		12/28/2014	0.06	Rain	1/22/2015	0.03	Rain
12/2/2014	0		12/29/2014	0		1/23/2015	0.08	Rain
12/3/2014	0		12/30/2014	0		1/24/2015	0.02	
12/4/2014	0.05	Rain	12/31/2014	0		1/25/2015	0.01	
12/5/2014	0.09	Rain	<b>2015 Precipitation Data</b>			1/26/2015	0	Fog
12/6/2014	0.25	Rain	<b>January</b>			1/27/2015	0.02	Rain
12/7/2014	0	Fog	1/1/2015	0		1/28/2015	0	
12/8/2014	0.45	Rain	1/2/2015	0.03		1/29/2015	0	
12/9/2014	0.42	Rain	1/3/2015	0	Rain	1/30/2015	0	Fog
12/10/2014	0.5	Rain	1/4/2015	0.22	Rain	1/31/2015	0	Fog
12/11/2014	0.33	Rain	1/5/2015	0.07	Rain	<b>February</b>		
12/12/2014	0		1/6/2015	0.01	Fog	2/1/2015	0.04	Rain
12/13/2014	0.01		1/7/2015	0		2/2/2015	0.3	Rain
12/14/2014	0	Fog	1/8/2015	0	Fog	2/3/2015	0.03	Fog-Rain
12/15/2014	0		1/9/2015	0.01	Fog-Rain	2/4/2015	0.3	Fog-Rain
12/16/2014	0	Rain	1/10/2015	0.18	Rain	2/5/2015	0.87	Rain
12/17/2014	0.16	Rain	1/11/2015	0.06	Fog-Rain	2/6/2015	0.75	Rain
12/18/2014	0.6	Rain	1/12/2015	0	Rain	2/7/2015	0.82	Rain
12/19/2014	0.13	Rain	1/13/2015	0		2/8/2015	0.15	Rain
12/20/2014	0.6	Rain	1/14/2015	0		2/9/2015	0.15	Rain
12/21/2014	0		1/15/2015	0.43	Rain	2/10/2015	0.02	Rain
12/22/2014	0		1/16/2015	0		2/11/2015	0	
12/23/2014	0.61	Rain	1/17/2015	0.76	Rain	2/12/2015	0.02	Rain
12/24/2014	0.12	Rain	1/18/2015	0.23	Rain	2/13/2015	0	Rain
12/25/2014	0		1/19/2015	0.03	Rain	2/14/2015	0.05	Rain
12/26/2014	0		1/20/2015	0		2/15/2015	0	
12/27/2014	0.12	Rain	1/21/2015	0	Fog	2/16/2015	0	
Precipitation Data			Kirkland, WA (KBFI)			<a href="http://www.wunderground.com/">http://www.wunderground.com/</a>		

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
2/17/2015	0							
2/18/2015	0							
2/19/2015	0.03	Rain						
2/20/2015	0.02	Rain						
2/21/2015	0							
2/22/2015	0							
2/23/2015	0							
2/24/2015	0							
2/25/2015	0.07	Rain						
2/26/2015	0.22	Rain						
2/27/2015	0.73	Rain						
2/28/2015	0							
<b>March</b>								
3/1/2015	0							
3/2/2015	0							
3/3/2015	0							
3/4/2015	0							
3/5/2015	0							
3/6/2015	0							
3/7/2015	0	Rain						
3/8/2015	0							
3/9/2015	0							
3/10/2015	0	Fog						